1 THE HONORABLE BARBARA J. ROTHSTEIN 2 3 4 5 6 IN THE UNITED STATE DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 7 AT SEATTLE 8 JENNIFER MILLER, CHRISTOPHER CAIN, Case No. 2:21-cy-00204-BJR JOSE GRINAN, KIMBERLY HALO, KELLY STIPULATED MOTION TO EXTEND KIMMEY, JUMA LAWSON, SHARON **DEFENDANTS' DEADLINE TO** PASCHAL, and PHILIP SULLIVAN, on behalf 10 RESPOND TO THE PENDING MOTION of themselves and all others similarly situated, TO SEAL 11 Plaintiff. 12 v. 13 AMAZON.COM, INC., and AMAZON LOGISTICS, INC., 14 Defendants, 15 16 Plaintiffs and Defendants, Amazon.com, Inc., and Amazon Logistics, Inc., (together the 17 "Parties"), stipulate and hereby jointly request that the Court enter an order extending Defendants' 18 deadline to respond to Plaintiffs' Moition to Seal Confidential Documents in Support of Their 19 Motion for Class Certification (Dkt. No. 108) (the "Motion to Seal") from the current deadline of 20 February 11, 2025 to February 25, 2025. 21 1. On January 21, 2025, Plaintiffs filed the Motion to Seal regarding documents 22 Plaintiffs have provisionally lodged under seal in support of their pending Motion to Certify a 23 STIPULATED MOTION TO EXTEND DEFENDANTS' MORGAN, LEWIS & BOCKIUS LLP ATTORNEYS AT LAW DEADLINE TO RESPOND TO THE PENDING 1301 SECOND AVENUE, SUITE 3000

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- 2. Pursuant to Local Civil Rule 5(g)(3)(B), Amazon intends to file a "specific statement of the applicable legal standard and the reasons for keeping [the Confidential Exhibits] under seal," including the specific explanations, in its responsive brief to the Motion to Seal. Under this Court's standing orders, that responsive brief is currently due by February 11, 2025.
- 3. Amazon requires additional time to gather the material to support its forthcoming request to retain the exhibits (Dkt. No. 109) under seal, and accordingly has requested—and Plaintiffs have agreed—to extend the deadline for Amazon to file its responding brief by two-weeks, to February 25, 2025.
- 4. Defendants' response to Plaintiffs' Motion to Certify a Class is not due until April 14, 2025, and that motion will not be fully briefed until April 28, 2025 (Dkt. No. 86). Accordingly, the brief two-week extension to file a response in support of the Motion to Seal will not delay adjudication of the underlying motion, affect future briefing on class certification, or otherwise delay litigation of this case.

THEREFORE, the Parties respectfully request that the Court enter an order extending Defendants' deadline to file a response in support of the pending Motion to Seal to **February 25**, **2025**.

IT IS SO STIPULATED.

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STIPULATED MOTION TO EXTEND DEFENDANTS' DEADLINE TO RESPOND TO THE PENDING MOTION TO SEAL – PAGE 2
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DATED this 4th day of February, 2025.

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د2	STIPULATED MOTION TO EXTEND DEFENDAN	TTS' MORGAN, LEWIS & BOCKIUS LLP ATTORNEYS AT LAW
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ORDER 1 2 The foregoing Stipulated Motion is GRANTED. Defendants shall respond to the Unopposed Motion to Seal Confidential Documents in Support of Their Motion for Class 3 Certification (Dkt. No. 108) on or before February 25, 2025. 4 5 IT IS SO ORDERED. 6 DATED this 5th day of February 2025. 7 8 9 10 THE HONORABLE BARBARA J. ROTHSTEIN UNITED STATES DISTRICT JUDGE 11 12 13 14 15 16 17 18 19 20 21 22 23 STIPULATED MOTION TO EXTEND DEFENDANTS' MORGAN, LEWIS & BOCKIUS LLP

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